

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Chapter 7 Estate of Bernard L.
Madoff,

Plaintiff,

v.

ABN AMRO BANK N.V. (presently known
as NATWEST MARKETS N.V.),

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Lead Adv. Pro. No. 10-05354 (CGM)

STIPULATION AND ORDER TO ADJOURN ARGUMENT DATE

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the Chapter 7 estate of Bernard L. Madoff, individually, and defendant ABN AMRO Bank N.V. (presently known as NatWest Markets N.V.) (“Defendant” and collectively, with the Trustee, the “Parties”), by and through their respective, undersigned counsel, hereby stipulate and agree in this Stipulation and Order to Adjourn Argument Date (the “Stipulation and Order”) as follows:

WHEREAS, on March 22, 2022, on consent by Defendant, the Trustee filed a Consolidated Second Amended Complaint (the “SAC”). ECF No. 220.

WHEREAS, on May 23, 2022, Defendant filed a Motion to Dismiss the SAC (the “Motion”), which lists November 16, 2022 as the hearing date. ECF No. 223.

WHEREAS, the Trustee timely filed an opposition to the Motion on July 22, 2022. ECF No. 226.

WHEREAS, Defendant timely filed a reply in further support of the Motion on August 23, 2022. ECF No. 230.

WHEREAS, on November 15, 2022, the Court filed a Notice of Adjournment of Hearing on the Motion to November 30, 2022. ECF No. 240.

WHEREAS, the Parties have agreed to request that the hearing on the Motion be adjourned from November 30, 2022 to December 14, 2022, at 10:00 a.m.

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, and **SO ORDERED**, by the Court that the hearing on Defendant’s Motion be adjourned from November 30, 2022 to December 14, 2022 at 10:00 a.m.

[Signatures on following page]

Dated: November 15, 2022
New York, New York

BAKER & HOSTETLER LLP

By: /s/ Patrick T. Campbell
45 Rockefeller Plaza
New York, New York 10111
T: 212.589.4200
F: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Patrick T. Campbell
Email: pcampbell@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard,
Trustee for the Liquidation of Bernard L.
Madoff Investment Securities LLC and the
estate of Bernard L. Madoff*

**REICHMAN JORGENSEN LEHMAN &
FELDBERG LLP**

By: /s/ Michael Feldberg
750 Third Avenue, Suite 2400
New York, New York 10017
T: 212.381.4970
Michael Feldberg
Email: feldberg@reichmanjorgensen.com

*Attorneys for Defendant ABN AMRO Bank N.V.
(presently known as NatWest Markets N.V.)*

**Dated: November 17, 2022
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**